

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

GLOBAL NAPS, INC.,
Plaintiff,

v.

VERIZON NEW ENGLAND, INC., et al.
Defendants.

Civil Action No. 02-12489-RWZ
Civil Action No. 05-10079-RWZ

**GLOBAL NAPS, INC.'S REPLY TO
VERIZON NEW ENGLAND, INC'S COUNTERCLAIM**

Global NAPs, Inc. (“Global”) replies to Verizon New England, Inc. (“Verizon”)’s counterclaim as follows:

1. This paragraph describes Verizon’s counterclaim and as such does not require a reply.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied.
6. Admitted.
7. Admitted.
8. Admitted.
9. Admitted.
10. Admitted.
11. Admitted.
12. The Order speaks for itself.

13. The Agreement speaks for itself.
14. The Agreement speaks for itself.
15. The Agreement speaks for itself.
16. The Agreement speaks for itself.
17. Denied.
18. Denied.

Count I

19. This paragraph does not require a reply.
20. Denied.
21. Global admits Verizon demanded payment, but denies any additional payment was due.
22. Denied.
23. Denied.
24. Denied.

Count II

25. Paragraph 25 does not require an answer.
26. Admitted.
27. Admitted.

Affirmative Defenses

The counterclaim should be dismissed for failure to state a claim on which relief can be granted.

Global NAPS, Inc. hereby demands a trial by jury of all issues triable to a jury.

DATED: June 9, 2006

Respectfully submitted,
GLOBAL NAPS, INC.

By:

/s/ Andrew Good
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Certificate of Service

The undersigned certifies that he has caused the foregoing to be served electronically and by first-class mail, postage prepaid, this date upon the following:

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Dated: June 9, 2006

/s/ Andrew Good